

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	NO. 3-CR-15-70370
)	
V.)	
)	JOINT STIPULATION REGARDING
)	PROVISION OF DISCOVERY AND
)	(PROPOSED) PROTECTIVE ORDER
)	
)	
CARL M. FORCE and)	
SHAUN W. BRIDGES ,)	
Defendants.)	

The United States, through its counsel of record (“the Government”) and defendants Carl M. Force and Shaun W. Bridges (“the Defendants”), by and through their counsel of record, Ivan Bates and Steven H. Levin, hereby agree and stipulate that the government will provide discovery on the following conditions set forth below. The reason for this Stipulation is that a substantial portion of the discovery in this case contains sensitive information, for example social security numbers and bank account information for each of the defendants. Likewise, the discovery contains email messages and text messages of the defendants and others. The parties and government agree that the most appropriate and expeditious manner for this case to move forward is that all discovery should be provided to each of the defendants, rather than piecemeal portions of discovery to each individual defendant. However, the parties jointly propose that this discovery collectively be deemed “Protected Material” subject to controls on who may view it.

It is proposed that possession of copies of the Protected Material is limited to the defendants, their attorneys of record, and investigators, paralegals, law clerks, translators, interpreters, expert and assistants for the attorneys of record (hereinafter collectively referred to as “members of the defense team”).

The defendants, their attorneys of record, and members of each defense team acknowledge that providing copies of the Protected Material to other persons is prohibited, and agree not to duplicate or provide copies of the Protected Material to other persons. The defendants, their attorneys of record, and members of the defense team may show Protected Material to witnesses or prospective witnesses in conjunction with their defense of the defendant in this case. The defendants, their attorneys of record, and members of the defense team further acknowledge that they are prohibited from using the Protected Material for any purpose other than defending the defendants in the above-captioned matter. Any violation of these prohibitions constitutes violation of the Protective Order. Further, the attorneys of record agree that prior to disseminating any copies of the Protected Material to members of the defense team, they will provide a copy of this Protective Order to members of the defense team.

All signatures acknowledge their redaction responsibilities before the public filing of any documents and, in compliance with Fed. R. Crim. P. 49.1, each signatory agrees to redact Social Security or taxpayer-identification numbers, financial account numbers, dates of birth, names of minor children and home addresses.

SO STIPULATED.

DATED May 11, 2015

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Trial Attorney

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Defendants.)	

UNITED STATES MAGISTRATE JUDGE